

BRENDAN M. KUNKLE (SBN 173292) bkunkle@abbeylaw.com
MICHAEL D. GREEN (SBN 214142) mgreen@abbeylaw.com
ABBEY, WEITZENBERG, WARREN & EMERY, P.C.
100 Stony Point Road, Suite 200
Santa Rosa, CA 95401
Telephone: 707-542-5050
Facsimile: 707-542-2589

Attorneys for Fire Victim Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**MOTION TO ALLOW/DEEM TIMELY
LATE FILING OF PROOFS OF CLAIM;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
BRENDAN M. KUNKLE**

Date:
Time:
Place:
Judge: Hon. Dennis Montali

Objection Deadline:

TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
PARTIES:

Abbey, Weitzenberg, Warren & Emery (“Abbey Law”), together with several other firms,
represent thousands of victims of the Fires started by PG&E in 2017 (generally referred to as the
“North Bay Fires”) and 2018 (“Camp Fire”).

Abbey Law respectfully files this motion (“Motion”) to allow the late filing of a proof of
claim and deem the proof of claim as having been timely filed for the fire victim Barbara Cuneo
(hereinafter “Movant”).

1 **I. SUMMARY OF ARGUMENT**

2 A proof of claim may be deemed timely upon a showing of excusable neglect and lack of
3 prejudice. In this case, Movant was unable to timely file a proof of claim form because she
4 reasonably did not know she had a valid claim for damages until after the Claims Bar Date.
5 Movant is a 97 year old woman who lost her home in the Tubbs fire. Movant did not know she
6 needed to file a lawsuit to receive compensation for the fire. After the Claims Bar Date, Movant
7 learned that she had a valid claim and needed to file a claim. Because there is no danger of
8 prejudice to the Debtors as Debtors' estates are solvent, and all creditors stand to be paid, the
9 Motion should be granted and Movant should be allowed to file a Proof of Claim and have it
10 deemed as timely. This Court must determine whether to grant the Motion.

11 **II. FACTUAL BACKGROUND**

12 **A. Movant's Claim Arising From North Bay Fires**

13 Movant is a 97 year old (DOB: 12/02/1924) woman that lived alone in her home of
14 approximately 50 years, located at 4335 Parker Hill Road, Santa Rosa, CA, when the Tubbs fire
15 destroyed her home. Movant was forced to evacuate her home the night of the fire with only the
16 clothes on her back, a few cherished photographs, her wallet, passport, and her library books. Now
17 97 years old, Movant is still recovering from the trauma of losing her home and her possessions.

18 Prior to the Claims Bar Date on December 31, 2019, Movant was wholly unaware that she
19 needed to file a claim because of her significant age, age-related impairments, limited access to
20 resources and information, and fire-related trauma. Subsequently, Movant learned that she had a
21 valid claim only recently upon hiring legal counsel in connection with a probate matter. As a
22 result, a proof of claim form was not filed on behalf of Movant before the Claims Bar Date.

23 **B. General Procedural Background**

24 On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company
25 ("Debtors" or "PG&E") commenced with the Court voluntary cases ("Chapter 11 Cases") under
26 Chapter 11 of the United States Code ("Bankruptcy Code"). PG&E's Chapter 11 filings were
27 necessitated by a confluence of factors resulting from catastrophic fires that occurred in Northern
28 California prior to the Petition Date, and PG&E's potential liabilities arising therefrom.

1 Since, the Debtors continue to operate their businesses and manage their properties as
2 debtors in possession pursuant to 11 U.S.C. §§ 1107(a) & 1108, the Debtors' Chapter 11 Cases are
3 being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal
4 Rules of Bankruptcy Procedure ("FRBP").

5 **C. Plan, Disclosure Statement, and the Solicitation Procedures Motion**

6 On January 31, 2020, as Dk. No. 5590, the Debtors filed an Amended Chapter 11 Plan
7 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated January 31,
8 2020.

9 On February 7, 2020, as Dk. No. 5700, the Debtors filed a Disclosure Statement for the
10 Amended Plan.

11 On February 19, 2020, as Dk. No. 5835, the Debtors filed Motion for Entry of an Order (I)
12 Approving Form and Manner of Notice of Hearing on Proposed Disclosure Statement; (II)
13 Establishing and Approving Plan Solicitation and Voting Procedures; (III) Approving Forms of
14 Ballots, Solicitation Packages, and Related Notices; and (IV) Granting Related Relief (the
15 "Solicitation Procedures Motion").

16 On March 16, 2020, as Dk. No. 6320, the Debtors filed the Amended Chapter 11 Plan
17 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16,
18 2020.

19 On March 17, 2020, the Solicitations Procedures Motion was approved and the
20 Disclosure Statement and Plan circulated for votes.

21 The Debtors Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint
22 Chapter 11 Plan of Reorganization Dated March 16, 2020 [Docket No. 6320] was amended on
23 May 22, 2020 [Docket No. 7521], and on June 19, 2020 [Docket No. 8048].

24 On June 20, 2020, an order was issued confirming Debtors' and Shareholder Proponents'
25 Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket No. 8053].

26 **D. Extended Bar Date for Fire Victim Creditors**

27 The deadline for filing proofs of claim with respect to any prepetition claim including, but
28 not limited to, all claims of Fire Claimants, Wildfire Subrogation Claimants, Governmental Units

1 and Customers, and for the avoidance of doubt, including all secured claims and priority claims,
2 against either of the Debtors was October 21, 2019 at 5:00 p.m. (“General Bar Date”). The
3 deadline for filing claims was extended to December 31, 2019 (“Extended Bar Date”), solely for
4 the benefit of any non-governmental Fire Claimants who did not filed Proofs of Claim by the
5 General Bar Date.

6 III. LEGAL ARGUMENT

7 In a Chapter 11 case, the time to file a proof of claim may be extended under certain
8 circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy
9 court has “broad equitable powers” in a Chapter 11 case with respect to the timing requirement for
10 proofs of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507
11 U.S. 380, 389 (1993). All in all, Rule 9006(b)(1) allows “late filings caused by inadvertence,
12 mistake, or carelessness, not just those caused by intervening circumstances beyond the party's
13 control.” *Id.*, at 381. Even a creditor that did in fact receive notice may file a proof of claim
14 notwithstanding the expiration of a claims bar date in a Chapter 11 case upon a showing of
15 “excusable neglect.” *Id.* At 394-95 (“Had respondents here been prevented from complying with
16 the bar date by an act of God or some other circumstance beyond their control, the Bankruptcy
17 Court plainly would have been permitted to find ‘excusable neglect’ [under FRBP 9006].”).

18 In considering whether a creditor’s failure was the product of “excusable neglect,” the
19 court should take “account of all relevant circumstances surrounding the party’s omission,”
20 including “the danger of prejudice to the debtor, the length of the delay and its potential impact on
21 judicial proceedings, the reason for the delay, including whether it was within the reasonable
22 control of the movant, and whether the movant acted in good faith.” *Id.* at 395; *see also Corning v.*
23 *Corning (In re Zilog, Inc.)*, 450 F.3d 996 (9th Cir. 2006) (noting *Pioneer*’s non-exhaustive list of
24 relevant factors). Again, a late-filed proof of claim is allowable where a creditor had actual notice
25 of the bankruptcy but, due to some external reason, failed to file a proof of claim or did not realize
26 that she had to, before the bar date. *See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d
27 996, 1003-07 (9th Cir. 2006) (applying the *Pioneer* factors).

28 ///

1 Here, consideration of all four *Pioneer* factors—as well as a fifth engrafted onto the
2 *Pioneer* analysis by some courts—weighs in favor of allowing Movant to file a late proof of claim.

3 The first *Pioneer* factor weighs overwhelmingly in Movant’s favor because there is no
4 danger of prejudice to the Debtors in this case. Debtors’ estates are solvent, and all creditors stand
5 to be paid. *See, e.g., In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and *In*
6 *re Sheehan Mem’l Hosp.*, 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate
7 is solvent, “the proper remedy for a late filing is not the expungement of a claim, but its allowance
8 as a tardily filed claim only.).

9 The second *Pioneer* factor is also satisfied by Movant because she expeditiously sought to
10 file a Proof of Claim form after discovering that she needed to do so and the resulting delay will
11 not impact the bankruptcy proceeding. Movant first learned of her need to file a claim after she
12 hired Abbey Law in March of 2022 to represent her in a probate matter. During this
13 representation, Movant mentioned the loss of her home in the Tubbs fire and was notified of her
14 ability to bring a claim. Counsel for Movant then filed the subject motion expeditiously. The
15 claims process is ongoing and, as such, Movant’s delay in filing her claim is negligible relative to
16 the bankruptcy proceeding. Permitting Movant to file a late claim will have no effect on the
17 bankruptcy given its current status.

18 The third and fourth *Pioneer* factors, the reasonableness in the delayed filing and whether
19 Movant acted in good faith, are also met. Movant was 92 years old when her home of
20 approximately 50 years and virtually all her belongings were destroyed by the Tubbs fire. In the
21 years following the fire, she was wholly unaware of her need to file a claim because of her age,
22 age-related impairments, limited access to resources and information, and difficult circumstances
23 recovering from the fire and fire-related trauma. Movant happen to discover that she needed to
24 file a claim because she hired counsel for a probate matter. Unfortunately, Movant learned about
25 the need to file her claim after the Claims Bar Date. Movant’s delay in learning that she had to
26 file a claim was therefore in good faith and the result of excusable neglect.

27 Lastly, any prospect of prejudice beyond solvency is unlikely given (a) all distributions
28 have not yet been made; and (b) the value of Movant’s claims relative to the value of Debtors’

1 estates is low. *See, e.g., In re Keene Corp.*, 188 B.R. 903, 910 (Bankr. S.D.N.Y. 1995) (size of the
2 late claim in relation to the estate is a consideration in determining prejudice).

3 **IV. CONCLUSION**

4 For the reasons set forth above, Movant respectfully requests that this Court enter an order
5 pursuant to Bankruptcy Rule 9006(b)(1) as follows:

- 6 1. Granting the Motion;
- 7 2. Finding that Movant be allowed to file a Proof of Claim and deem it as having been
8 timely filed;
- 9 3. Granting such other or further relief as the Court deems just and proper.

10
11 DATED: April 14, 2022

ABBEY, WEITZENBERG, WARREN & EMERY PC

12
13 By: /s/ Brendan M. Kunkle
BRENDAN M. KUNKLE (SBN 173292)
14 **ABBEY, WEITZENBERG, WARREN &
EMERY PC**
15 100 Stony Point Road, Suite 200
Santa Rosa, CA 95401
16 Telephone: 707-542-5050
Facsimile: 707-542-2589
17 bkunkle@abbeylaw.com

18 *Attorneys for Numerous Fire Claimants*

19
20
21
22
23
24
25
26
27
28

1
2
3 **CERTIFICATE OF SERVICE**
4

5 I hereby certify that on April 14, 2022, a copy of the foregoing was filed electronically.
6 Notice of this filing will be sent by operation of the Court's electronic filing system to all parties
7 indicated on the electronic filing receipt. Parties may access this filing through the Court's
8 electronic filing system.

9
10 /s/ Brendan M. Kunkle

11 Brendan M. Kunkle
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	Cuneo, Barbara Jean Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Cuneo, Barbara Jean</u> Attorney Name (if applicable) <u>Kunkle, Brendan</u> Attorney Bar Number (if applicable) <u>173292</u> Street Address <u>100 STONY POINT ROAD, #200</u> City <u>SANTA ROSA</u> State <u>CA</u> Zip Code <u>95401</u> Phone Number <u>707-542-5050</u> Email Address <u>BKunkle@abbeylaw.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input type="checkbox"/> Camp Fire (2018) <input checked="" type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)	Location(s): 4335 Parker Hill Road, Santa Rosa, CA 95404
9. How were you and/or your family harmed? Check all that apply	<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input type="checkbox"/> Business Loss/Interruption <input type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input type="checkbox"/> Other (Please specify): _____
10. What damages are you and/or your family claiming/seeking? Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
11. How much is the claim?	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it, FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Brendan M. Kunkle
-Brendan M. Kunkle (Mar 17, 2022 09:03 PDT)

Email: aproulx@abbeylaw.com

Signature

Print the name of the person who is completing and signing this claim:

Name	Brendan	M.	Kunkle
	First name	Middle name	Last name
Title	Partner		
Company	Abbey, Weitzenberg, Warren & Emery		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	100 Stony Point Road, #200		
	Number	Street	
	Santa Rosa	CA	95401
	City	State	ZIP Code
Contact phone	707-542-5050	Email	aproulx@abbeylaw.com

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☒ I have supporting documentation.
(attach below)

☐ I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.** Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Electronic Proof of Claim_@WVHM27402[[CSLT#4025#CF]]

Final Audit Report

2022-03-17

Created:	2022-03-17
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAq7AIQneCJdSICpEIR3JctKnumOTp4O0M

"Electronic Proof of Claim_@WVHM27402[[CSLT#4025#CF]]" History



Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)

2022-03-17 - 3:35:21 PM GMT



Web Form filled in by Brendan M. Kunkle (aproulx@abbeylaw.com)

2022-03-17 - 4:03:05 PM GMT- IP address: 135.180.208.242



(User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:96.0) Gecko/20100101 Firefox/96.0)

2022-03-17 - 4:03:08 PM GMT- IP address: 135.180.208.242



Agreement completed.

2022-03-17 - 4:03:08 PM GMT

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3

4
56
78
9
1011
12
1314
15
16

17
18
19
20
21

22
23
24

2.5

26

27

28

1 she had a valid claim only recently upon hiring my firm in connection with a probate matter. As a
2 result, a proof of claim form was not filed on behalf of Movant before the Claims Bar Date.

3 I declare under penalty of perjury under the laws of the State of California that the forgoing
4 is true and correct and executed this 14 day of April 2022.

5
6 /s/ Brendan M. Kunkle
BRENDAN M. KUNKLE